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*Attorneys for Defendants Hi-Tech Security, Inc.
and William Roseberry*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WESCO INSURANCE COMPANY, as subrogee of its
insured, NICKELS AND DIMES INCORPORATED,

Plaintiff,

vs.

SMART INDUSTRIES CORPORATION dba SMART
INDUSTRIES CORP., MFG., an Iowa corporation,

Defendants.

CASE NO. 2:16-cv-01206-JCM-CWH

**STIPULATION AND [proposed]
ORDER FOR EXTENSION OF TIME
FOR FILING JOINT PRETRIAL
ORDER (Fourth Request)**

JENNIFER WYMAN, individually; BEAR WYMAN,
a minor, by and through his natural parent JENNIFER
WYMAN; JENNIFER WYMAN and VIVIAN SOOF,
as Joint Special Administrators of the ESTATE OF
CHARLES WYMAN,

Plaintiffs,

vs.

SMART INDUSTRIES CORPORATION dba SMART
INDUSTRIES CORP., MFG; HI-TECH SECURITY
INC; WILLIAM ROSEBERRY; BOULEVARD
VENTURES, LLC; SANSONE COMPANIES, LLC;
DOES I through V; and BUSINESS ENTITIES I
through V, inclusive,

Defendants.

CONSOLIDATED WITH
CASE NO. 2:16-cv-02378-RFB-GWF

1 A settlement conference was held in the above-referenced matter on October 30, 2018. The
2 parties were unsuccessful in reaching a settlement agreement. Prior to the settlement conference, a
3 Stipulation and Order (ECF Nos. 54 and 55) was entered extending the time for filing the Joint Pretrial
4 Order to thirty days after the settlement conference, if a settlement was not reached. On November 29,
5 2018, the parties filed a Stipulation and Order (ECF Nos. 62 and 63) to extend the deadline by 30 days
6 until January 2, 2019. On December 21, 2018, the parties filed a Stipulation and Order (ECF Nos. 64
7 and 65) to extend the deadline until February 1, 2019.

8 On January 23, 2019, the Wyman Plaintiffs' counsel circulated a 21-page proposed draft of the
9 Joint Pretrial Order, which addressed Plaintiffs' desired stipulated facts, documents, witness, designated
10 deposition transcripts, and statements of issues to be decided. The Defendants' counsel have reviewed
11 this proposed draft and need additional time to fact check the content sought by the Wyman Plaintiffs,
12 and to prepare and offer their own content additions, objections, counter-designations, and other
13 revisions. The parties also need additional time to meet and confer regarding their respective positions
14 on the contents of the Joint Pretrial Order, and to form related evidentiary stipulations or objections.
15 The parties desire, through meeting and conferring about these issues, to reduce the number and scope of
16 any disputes that might need to be brought before this Court.

17 To permit sufficient time to accomplish these matters, the parties hereby request that the deadline
18 to file the Joint Pretrial Order be extended by four weeks to March 1, 2019. This Stipulation is

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submitted in good faith and is not interposed for purposes of delay. **This is the fourth request to extend the deadline for filing the Joint Pretrial Order.**

Respectfully submitted,

DATED this 29th day of January 2019.

HALL JAFFE & CLAYTON, LLP

By: 

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*Attorneys for Hi-Tech Security, Inc.
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DATED this 29th day of January 2019.

GREENMAN GOLDBERG RABY & MARTINEZ

By: /s/ Dillon G. Coil

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Attorneys for Wyman Plaintiffs

DATED this 30th day of January 2019.

BARRON & PRUITT, LLP

By: /s/ David Barron

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Attorneys for Smart Industries Corporation

DATED this 29th day of January 2019.

DUBOWSKY LAW OFFICE, CHTD.

By: /s/ Amanda C. Vogler-Heaton

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Attorneys for Wesco Ins. Co.

ORDER

IT IS SO ORDERED.

DATED this 4 day of February 2019.


UNITED STATES MAGISTRATE JUDGE